

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

MANGO LABS, LLC

Plaintiff,

v.

JOHN KRAMER, and
MAXIMILIAN SCHNEIDER

Defendants.

CIVIL NO. 24-1469 (GMM)

**INITIAL MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

TO THE HONORABLE COURT AND CLERK OF COURT:

COMES NOW Maximilian Schneider (“Schneider”), through the undersigned legal representation, and without submitting to the Court’s jurisdiction or waiving any argument or defense, respectfully states and prays as follows:

1. Per Motion of Proof of Service of Summons and Complaint By Alternate Means filed by Plaintiff, Defendant Schneider was served on 13 FEB 2025. *See DKT No. 27*. Pursuant to the Federal Rules of Civil Procedure, Mr. Schneider’s deadline to answer or otherwise plead is 06 MARCH 2025.

2. The Masini Law Firm and the undersigned attorney from the Masini Law Firm, was recently retained to represent Mr. Schneider as local counsel in this adversary proceeding.

3. The appearing defendant and counsel are currently in the process of familiarizing themselves with the allegations and investigating the claims asserted in the Complaint and

require an initial extension of time of thirty (30) days in order to answer or otherwise plead.

4. Furthermore, at times communication between attorney and client can be slightly delayed as Mr. Schneider currently resides in Europe while this matter and proceedings are in the District of Puerto Rico and counsels are in the District of Puerto Rico and the Southern District of New York.

5. Moreover, the extension falls within the purview of Local Rule 6, which authorizes the Clerk of the Court to enter an order for a first extension of time of no more than thirty (30) days.

6. Mr. Schneider further respectfully submits this extension is requested as part of a good faith attempt to present a complete and adequate responsive position on behalf of and to allow it to conclude the investigation and analysis of the related facts and applicable law, which will result in a more expeditious resolution of the case.

WHEREFORE, Mr. Schneider respectfully requests an extension of time of thirty (30) days, until 04 APRIL 2025, to answer the Complaint or otherwise plead.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 05 day of MARCH 2025.

s/ Juan M. Masini Jr.
Juan M. Masini Jr.
USDC-PR No. 210012
MASINI LAW FIRM
L&M Bldg. Suite B
G-14 O'Neill St.
San Juan, Puerto Rico 00918
Tel.: +1-787-758-2090
Fax: +1-787-282-6049
JMMasiniM@gmail.com

Attorneys for Maximilian Schneider

WE HEREBY CERTIFY that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

s/ Juan M. Masini Jr.

Juan M. Masini Jr.

USDC-PR No. 210012

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Attorneys for Maximilian Schneider.